

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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SHERMAN CREEK CONDOMINIUMS, INC.	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No.: 2023-cv-375
	)	
MID-CENTURY INSURANCE COMPANY,	)	Hon. Brett H. Ludwig
	)	
Defendant.	)	
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	)	
MID-CENTURY INSURANCE COMPANY,	)	
	)	
Third-Party Plaintiff,	)	
	)	
v.	)	
	)	
MGW LAW, LLP; RYAN R. GRAFF; CRIVELLO	)	
CARLSON, S.C.,	)	
	)	
Third-Party Defendants.	)	

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**JOINT MOTION TO EXTEND EXPERT DISCOVERY DEADLINES**

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1. In accordance with the Scheduling Order entered on January 11, 2024, primary expert witness disclosures are due on June 28, 2024, rebuttal expert witness disclosures are due on August 19, 2024, and all expert discovery must be completed by September 30, 2024. *See* Dkt. #56.

2. Pursuant to Fed. R. Civ. P. 6(b)(1)(A), Third-Party Plaintiff Mid-Century Insurance Company and Third-Party Defendants MGW Law, LLP and Ryan R. Graff seek an extension of thirty days for expert discovery deadlines, up to and including: **July 29, 2024** for primary expert witness disclosures; **September 18, 2024** for rebuttal expert witness disclosures; and **October 30, 2024** for expert discovery completion.

3. The moving parties have good cause for the requested extension. The deposition of

Donald Carlson, one of the attorneys for Crivello Carlson, S.C. (“Crivello Carlson”) in the underlying coverage litigation, was just deposed on June 26, 2024; no witnesses from Mid-Century Insurance Company, Crivello Carlson’s client, or MGW Law have been deposed; and there are outstanding written discovery requests to Crivello Carlson. Accordingly, it would be premature for the moving parties to complete expert disclosures, as they would likely have to be amended following those depositions and completion of the above discovery

4. No parties will be prejudiced by this extension of time. In fact, counsel for Third-Party Defendant, Crivello Carlson has agreed to this requested extension.

5. This motion is made in good faith – not for improper purpose or to cause undue delay.

WHEREFORE, MID-CENTURY INSURANCE COMPANY, MGW LAW, LLP, and RYAN R. GRAFF, respectfully request this Court enter an order extending the expert discovery deadlines by 30 days, up to and including July 29, 2024 for primary expert witness disclosures, September 18, 2024 for rebuttal expert witness disclosures, and October 30, 2024 for expert discovery completion, as well as for all other relief that this Court deems fair and just.

Dated: June 28, 2024

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